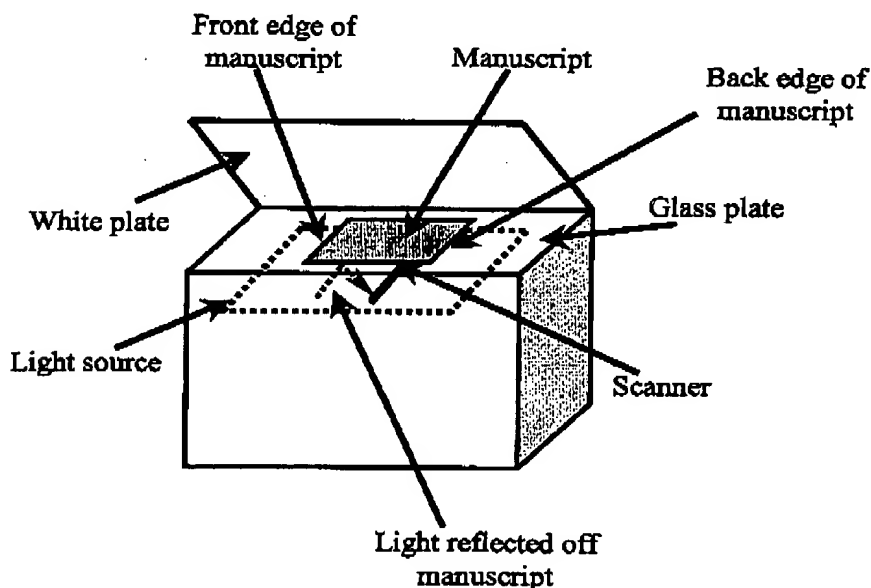


**REMARKS**

1. The examiner has rejected claims 1-126 as being obvious over Ward et al (US Patent 5,491,495) in view of Hagihara (USPN 5,999,275).
2. In his assessment of Ward the Examiner again correctly observes that "*Ward does not teach the interface surface which includes coded data indicative of a drawing field or indicative of an identity of an interface surface.*" He then argues that Hagihara teaches these features.
3. In order to fully respond to the Examiner's arguments, it is important to gain an understanding of the nature of the invention disclosed in Hagihara. The following diagram is useful for this purpose, since the only diagram in Hagihara is not particularly helpful:



The Hagihara invention is designed for use in scanning devices such as photocopiers. The purpose of the Hagihara arrangement is to detect the size of the document being copied, which Hagihara calls the "manuscript."

The diagram shows a photocopier with its lid open. On the under-side of the lid is a white plate. The manuscript is sitting on a glass plate, under which is a light source and a scanner. The scanner detects light which is reflected off the under-side of the manuscript and compares this to light reflected off the white plate (when the photocopier lid is closed). In order to determine the size of the manuscript, the Hagihara system detects the shadow cast by the manuscript, around the edges of the manuscript. This shadow at the edges of the manuscript is what Hagihara calls a "shading line." When Hagihara says "*the scanner 1*

*reads a shading line of the front end of the manuscript on the surface of the white plate*" in column 5, lines 30 to 32, it means that the scanner detects the shadow cast by the front edge of the manuscript onto the white plate behind the manuscript.

Hagihara's arrangement detects the length of the shadow to determine the width of the manuscript and detects the distance between the shadows cast by the front and back edges of the manuscript in order to detect the length of the manuscript.

As part of the calculations involved in the Hagihara system, the system converts the density of light reflected off the shadows into *"binary coded 26 representing this shading line"* (Col. 5, lines 34-35). However, there is no suggestion in Hagihara that either the manuscript itself or the white plate include any *"coded data,"* nor do they disclose any *"coded data indicative of a drawing field"* as claimed in independent claims 1, 29, 57 and 90 or *"coded data indicative of an identity of the interface surface"* as claimed in independent claims 9 and 37.

The Hagihara *"binary coded data 26"* is merely the digital output resulting from the comparison of the densities of light reflected off the shadowed edge of the manuscript. Accordingly, neither Ward nor Hagihara disclose an interface surface which includes coded data indicative of a drawing field or indicative of an identity of an interface surface, as claimed.

In light of these arguments, the Examiner is requested to reconsider and withdraw his obviousness objections to claims 1, 9, 29, 37, 58 and 90.

4. Since independent claims 1, 9, 29, 37, 57 and 90 are novel and inventive, their respective dependent claims are also novel and inventive. Nevertheless, for completeness, the Applicant wishes to make a number of comments in relation to the dependent claims. These comments were made on the last occasion, but were not responded to by the Examiner in the latest Office Action. The Examiner is requested to fully consider these arguments in relation to the dependent claims:

(a) Claims 4 and 32: The Examiner suggests that these claims are anticipated by Ward's Figure 2. However, Figure 2 does not show an interface surface, nor does it show a *"visible drawing zone defined on the interface surface."* The Applicant fails to see the relevance of Figure 2 to claims 4 and 32.

(b) Claims 5, 6, 26, 27, 33, 34, 54, 55, 58, 59, 86-89, 91-93 and 118-126: The Examiner argues that the claimed *"tags"* which are *"indicative of the drawing field"* and *"are also indicative of points within the drawing field"* are anticipated by Ward's *"multi code sequence."* However, the Examiner does not point to any particular section of Ward to support his view, nor does he give his reasons for equating the claimed *"tags"* with Ward's

"multi code sequence." Without such reasons, the Applicant is not in a position to respond to the Examiner's objection.

(c) Claims 7, 8, 28, 35, 36, 56, 70, 71, 84, 85, 104 and 105: The Examiner suggests that the claimed tags which include *"first identity data"* and *"second identity data"* which define the position of the tag *"in relation to the drawing field"* is equivalent to the *"stylus position in terms of conversion from absolute motion to relative motion."* Again the Examiner does not refer to specific sections of Ward. Furthermore, it is difficult to see how Ward can anticipate these specific details of the claimed coded data tags, since the Examiner admits that *"Ward does not teach the interface surface which includes coded data ..."*. If Ward does not disclose coded data, it does not disclose the specific type of coded data which the Applicant has called *"tags."* The Applicant submits for these reasons that Ward does not anticipate these claims.

(d) Claims 10, 22-23, 38, 60-65 and 94-99: Again the Examiner has not pointed to particular sections of Ward to support his argument and has therefore not given the Applicant enough information to reply to the objection raised. The Applicant submits that Ward does not anticipate these claims.

(e) Claims 11, 39, 72-75 and 106: The Examiner suggests that Ward teaches that the *"sensing device includes at least one acceleration measuring device."* He equates the acceleration measuring device in the sensing device with the *"speeds of the interface processor."* In reply the Applicant submits that there is no correlation between the Ward interface and the claimed sensing device. Furthermore, the Ward stylus does not contain any sort of acceleration measuring device. For these reasons the Applicant fails to see how Ward discloses a sensing device which includes any sort of *"acceleration measuring device."* The Applicant submits that Ward does not anticipate these claims.

(f) Claims 12-15, 40-43, 76 and 107-110: These claims include a large number of features. One feature is that *"the relative displacement is obtained by doubly integrating the acceleration with respect to time"*. The features listed by the Examiner as anticipating these claims make no reference to *"doubly integrating the acceleration with respect to time"* and therefore do not anticipate these claims. Another feature of these claims is that *"the acceleration measuring device includes one or more accelerometers."* Once again, the features listed by the Examiner as anticipating these claims make no reference to any accelerometers and therefore do not anticipate these claims. A number of other un-anticipated features are present in these claims but the absence of the above features from Ward should be sufficient to render further argument unnecessary. The Applicant submits that Ward does not anticipate these claims.

(g) Claims 16, 44, 77-79 and 111: The Examiner suggests that Ward anticipates the feature of *"the position elements are disposed on the surface as a regular array of dots, lines or other formations"*. The Examiner suggests that Ward's *"writing recognition input device handling multiple lines"* anticipates such position elements. In reply, the Applicant submits that the *"position elements"* are clearly a form of coded data disposed on the surface. In contrast, the feature of Ward referred to by the Examiner is merely the ability of the Ward device to capture more than one line of written text. The text *"lines"* in Ward are clearly not the same as the *"line"* embodiment of the *"position elements"* in these claims. Furthermore, as argued above, the Examiner has already admitted that Ward does not disclose any coded data. Since the *"position elements"* are a form of coded data, they cannot be anticipated by Ward.

(h) Claims 17, 45, 112 and 113: It is difficult to see how the Examiner can equate the characteristic of the position elements as being *"disposed on the surface stochastically"* with the teaching in Ward that the *"stylus which start[s] on the object, may or may not be trackable in terms of its ... position."* Given the complete lack of correlation, combined with the fact that Ward does not disclose the use of any coded data, it is difficult to appreciate the Examiner's point. The Applicant submits that Ward does not anticipate these claims.

(i) Claims 18, 46, 80-83 and 114: Whilst it is true that Ward does disclose *"tracking of the motion of the stylus"*, it is not true that this is done using *"motion sensing elements rotatably mounted to the sensing device for contact with the surface"* as is claimed. Ward therefore does not anticipate these claims.

(j) Claims 19-21, 47-49 and 115-117: Whilst it is true that Ward does disclose *"the use of a variety of stylus"*, it is not true that Ward teaches any stylus having *"one or more rollerballs mounted for rotation within a constraining housing."* Ward therefore does not anticipate these claims.

(k) Claims 24-25 and 52-53: These claims speak of the *"first identity data"* which is part of the information stored in the tags, the tags being one form of the *"coded data."* Since Ward does not disclose any coded data, it is difficult to see how it could possibly disclose *"first identity data."* The features of Ward mentioned by the Examiner are not relevant. The Applicant submits that Ward does not anticipate these claims.

5. The Applicant submits that the claims at present on file are not obvious in light of Ward in view of Hagihara. The Applicant requests that the Examiner reconsider his obviousness objection and allow this application to proceed to acceptance.

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6. The Applicant notes that the minor amendments made to the claims at present on file were done in order to correct a number of typographical errors and to improve their clarity. These amendments were not made in order to overcome the prior art, as the un-amended claims did not read on the prior art.

### CONCLUSION

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

Applicant:



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PAUL LAPSTUN



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